

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA                          )  
  )  
  )  
v.   )       **1:16-CR-228**  
  )  
  )  
**RUSLANS BONDARS,**                                 )       **Trial: May 7, 2017**  
  )  
  )  
**Defendant.**   )

**DEFENDANT'S PROPOSED VOIR DIRE**

COMES NOW the Defendant, Ruslans Bondars, by counsel, and offers the following proposed voir dire:

1. Has anyone (or your close friends or family) ever been employed by a law enforcement agency or applied to one for employment?  
If so which one, and when?
2. Has anyone (or your close friends or family) ever been employed by an intelligence agency or applied to one for employment?  
If so which one, and when?
3. Does anyone have a law degree or work as a practicing attorney?  
If so, what kind of attorney?
4. Does anyone (or your close friends or family) work for the Department of Justice or a prosecutor's office?  
If so, which office?
5. Has anyone (or your close friends or family) ever had their identity stolen?  
If so, what were the circumstances? What ended up happening?
6. Has anyone (or your close friends or family) ever been the victim of fraud  
If so, what were the circumstances? What ended up happening?
7. Did anyone (or your close friends or family) have their credit card information compromised in the 2013 Target data breach?  
If so, what were the circumstances? What was the result?
8. Does anyone work in the Information Technology business ("IT")?  
If so, in what regard? And for how long?

9. Does anyone (or your close friends or family) work for an antivirus company?  
If so, in what regard? And for how long?
10. Does anyone have specialized computer skills?  
If so, what are they?
11. Does anyone know how to read or create computer code or scripts?  
If so, please describe your knowledge.
12. Does anyone have specialized knowledge of malware or executable files generally?
13. Does anyone use the service, Virus Total?
14. Does anyone have experience with Bitcoin or Bitcoin mining?
15. Does anyone use the service TOR Browser or a Virtual Private Network (VPN)?
16. Does anyone speak Russian?
17. Does anyone speak Latvian?
18. Has anyone (or your close friends or family) worked for, or applied to work for, the Russian Government in any capacity?  
If so, in what regard?
19. Has anyone (or your close friends or family) worked for, or applied to work for, the Latvian Government in any capacity?  
If so, in what regard?
20. Has anyone (or your close friends or family) been involved with any type of investigation into possible Russian computer intrusions or election interference?
21. Has anyone followed closely the FBI investigation into possible Russian computer intrusions or election interference?  
If so, where do you obtain your information and how often?

Respectfully Submitted,  
RUSLANS BONDARS  
By Counsel  
HARRIS CARMICHAEL & ELLIS, PLLC  
/s/  
Jessica N. Carmichael, Esq. VSB# 78339  
Yancey Ellis, Esq. VSB# 70970  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of May, 2018, I filed the foregoing pleading through the ECF system, which shall then send an electronic copy of this pleading to all parties in this action.

/s/  
Yancey Ellis